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*Attorneys for Defendants Fisher-Price, Inc.
and Mattel, Inc.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FARRAH SHOUKRY, individually and on behalf of all
other similarly situated,

Plaintiff,

-against-

FISHER-PRICE INC., a Delaware Corporation and
MATTEL, INC., a Delaware Corporation, each separately
and on behalf of all other entities similarly situated,

Defendants.

ELECTRONICALLY FILED

ECF CASE

**Civil Action No. 07 CV 7182 (DLC)
(DCF)**

**NOTICE OF MOTION OF
DEFENDANTS FISHER-PRICE,
INC. AND MATTEL, INC.
TO STAY ALL PROCEEDINGS
PENDING A DECISION
ON DEFENDANTS' MOTION
TO TRANSFER UNDER
28 U.S.C. § 1407**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Michael J. Templeton, executed on September 26, 2007, together with the exhibits annexed thereto, the accompanying Memorandum of Law in Support of Defendants' Motion to Stay All Proceedings Pending a Decision on Defendants' Motion to Transfer Under 28 U.S.C. § 1407, submitted herewith, and all prior pleadings and proceedings had herein, Defendants Fisher-Price, Inc. and Mattel, Inc. ("Defendants"), by their undersigned attorneys, will move this Court before the Honorable Denise L. Cote, United States District Judge, Southern District of New York, at the

United States Courthouse, 500 Pearl Street, New York, New York, 10007-1312, at a date and time to be determined by the Court, for an Order (1) staying all proceedings in this action pending the decision by the Judicial Panel on Multidistrict Litigation on Defendants' motion to transfer for pretrial coordination pursuant to 28 U.S.C. § 1407; and (2) for such other and further relief as the Court deems just and proper.

Dated: New York, New York
September 26, 2007

Respectfully submitted,

s/ Michael J. Templeton
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CERTIFICATE OF SERVICE

I, Catherine M. Ferrara-Depp, hereby certify that on September 26, 2007, a true and correct copy of the NOTICE OF MOTION OF DEFENDANTS FISHER-PRICE, INC. AND MATTEL, INC. TO STAY ALL PROCEEDINGS PENDING A DECISION ON DEFENDANTS' MOTION TO TRANSFER UNDER 28 U.S.C. § 1407 was electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to:

Attorney for Plaintiff and Purported Class Members:

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I FURTHER CERTIFY that on September 26, 2007, true and correct copies of the NOTICE OF MOTION OF DEFENDANTS FISHER-PRICE, INC. AND MATTEL, INC. TO STAY ALL PROCEEDINGS PENDING A DECISION ON DEFENDANTS' MOTION TO TRANSFER UNDER 28 U.S.C. § 1407 were served via overnight delivery service to the following counsel of record:

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